

Mar 27 2020 12:50 PM
LUVADA S. WILSON
CLERK OF COURTS
2020 CV 0150
Binette, Roger E

IN THE COMMON PLEAS COURT OF ERIE COUNTY, OHIO

**RONALD L. AND SANDRA S.
JOHNSON, INDIVIDUALLY AND AS
TRUSTEES OF THE RONALD L.
JOHNSON TRUST AND/OR
SANDRA JOHNSON TRUST**
10510 Mudbrook Road
Huron, Ohio 44839,

and

RONALD L. JOHNSON TRUST
10510 Mudbrook Road
Huron, Ohio 44839,

and

SANDRA JOHNSON TRUST
10510 Mudbrook Road
Huron, Ohio 44839,

Plaintiffs,

-vs-

NEXUS GAS TRANSMISSION, LLC
6050 Oaktree Blvd., Suite 200
Independence, Ohio 44131,

P.O. Box 490
Sharon Center, Ohio 44274,

and

DTE ENERGY COMPANY
One Energy Plaza
Detroit, Michigan 48226,

and

Case No.

COMPLAINT

Judge

Trial by Jury Endorsed Hereon

Exhibit A

ENBRIDGE, INC.)
5400 Westheimer Court)
Houston, Texas 77056,)
)
and)
)
DYKON BLASTING CORP.)
8120 West 81st Street)
Tulsa, Oklahoma 74131,)
)
and)
)
JOHN DOE I)
(name unknown),)
)
and)
)
JOHN DOE II)
(name unknown),)
)
and)
)
JOHN DOE III)
(name unknown),)
)
and)
)
JOHN DOE IV)
(name unknown))
)
)
Defendants.)
_____)

PARTIES, JURISDICTION AND VENUE

(1) Plaintiffs, Ronald L. and Sandra S. Johnson, Individually and/or as Trustees of the Ronald L. Johnson Trust and/or Sandra Johnson Trust, suffered injury and damage including, but not necessarily limited to, the real property located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio, Auditor Parcel #: 50-00330.000. This real property is titled in the name of the Ronald L. Johnson and/or Sandra Johnson Trusts.

(2) The damages to the real property located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio, Parcel: 50-00330.000, were the direct and proximate result of the activities of defendants, and/or defendants are vicariously liable for the activities of co-defendants or third parties in the construction of a natural gas pipeline on property adjacent and/or neighboring to (in the vicinity of) the real property owned by plaintiffs.

(3) Nexus Gas Transmission, LLC is an approximately 256 mile, 36" natural gas transmission pipeline from points in Eastern Ohio to existing pipeline system interconnects in Southeastern, Michigan. The natural gas pipeline construction activities performed by Nexus Gas Transmission, LLC and/or the other defendants which caused the damage to plaintiffs' real property occurred in Erie County, Ohio. Based upon information and belief, said damage resulted from vibrations and concussions caused by boring and/or blasting for the pipeline approximately 50 feet under the bed of the Huron River, as well as other borings and/or blasting during the construction of the pipeline in the approximate period April into June, 2018. Said borings and/or blasting was performed in whole or in part by Dykon Blasting Corp.

(4) Defendant, Nexus Gas Transmission, LLC, is an entity created under the laws of the State of Delaware. Nexus Gas Transmission, LLC's principal place of business during all relevant periods, including and up to the present, is the State of Ohio as reflected by its correspondence to plaintiff which identified its business address as P. O. Box 490, Sharon Center, Ohio and 6050 Oak Tree Blvd., Suite 200, Independence, Ohio. Nexus has also used the business address of 5810 Southwyck Boulevard, Suite 101, Toledo, Ohio. Nexus Gas Transmission, LLC is registered as a business entity with the Ohio Secretary of State.

(5) Defendant, Nexus Gas Transmission, LLC, pursuant to information at its website, is a 50-50 partnership between DTE Energy Company and Enbridge, Inc.. The website identifies contacts for Nexus Gas Transmission, LLC, individuals at enbridge.com including, but not necessarily limited to, Walton Johnson, who purportedly was the Right of Way Project Manager for Nexus Gas Transmission, LLC, while also being an employee and/or agent of Enbridge Inc. Based upon information and belief, DTE Energy Company and/or Enbridge, Inc. controlled the actions of Nexus Gas Transmission, LLC, including its construction activities.

(6) Based upon information and belief, DTE Energy Company is a corporation organized under the laws of the State of Michigan, with its principal headquarters being located in Detroit, Michigan.

(7) Based upon information and belief, Enbridge, Inc. is a business entity organized under Canadian law, having a headquarters in Calgary, Alberta, Canada, with offices in the United States at 5400 Westheimer Court, Houston, Texas and Superior, Wisconsin.

(8) Defendant, Dykon Blasting Corp., bored and/or blasted 40,492 feet of rock, and 80,996 cubic yards of excavated rock on approximately 80 miles of 36" pipeline in 2018 in Ohio with respect to the Nexus pipeline referred to in paragraph 3 of this Complaint. Dykon Blasting Corp. has its principal place of business in Oklahoma, and it is incorporated in the State of Oklahoma. Dykon Blasting Corp. was hired to bore and/or blast in order to construct the gas pipeline in Erie County, Ohio which boring and/or blasting damaged plaintiffs' property.

(9) Defendants, John Doe I, John Doe II, John Doe III, and John Doe IV are potential contractors, subcontractors, and/or owners of real property or interests in real property and/or other entities who may be liable to plaintiffs for the damages caused to the real property located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio, Auditor Parcel #: 50-

00330.000, by the construction of the natural gas pipeline referenced herein in Erie County, Ohio.

GENERAL FACTUAL ALLEGATIONS

(10) Plaintiffs state that the injuries and damages sustained to the property located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio Auditor Parcel #: 50-00330.000, were the result of vibrations and concussions in the approximate April into June, 2018 timeframe directly and proximately caused by the construction of the Nexus Gas Transmission, LLC pipeline in Erie County, Ohio.

(11) In approximately 1978, plaintiffs, Ronald L. and Sandra S. Johnson, constructed an underground home with a property and mailing address of 10510 Mudbrook Road, Huron, Ohio 44839. The underground home is identified on Erie County, Ohio Auditor's website as Parcel #: 50-00330.000. Said home is located in Erie County, Ohio. Plaintiffs have resided in their underground home for the past 41 years, except for wintering in Florida for approximately the past 15 years.

(12) During the relevant times herein, plaintiffs have dealt with a number of individuals who they believe, but are not sure, were agents and/or employees of Nexus Gas Transmission, LLC. These individuals include, but are not necessarily limited to: Dave Batton, Sr., Chris Simmons, Clay Hayden, Cliff Hance, Jonathan Thompson, and Tom Miller. Some of these individuals and/or other agents and/or employees of Nexus Gas Transmission, LLC may have been residents of the State of Ohio.

(13) In approximately mid April 2018, plaintiffs returned to their home after spending approximately three and one-half (3 ½) months in Florida, starting in approximately January of 2018.

(14) Upon plaintiffs' return, they called Chris Simmons, an apparent agent for Nexus Gas Transmission, LLC and/or an agent for the other defendants and advised him that they felt vibration on windows in their home. Plaintiffs were advised that Chris Simmons would notify his supervisors regarding their call. Plaintiffs were advised that Clay Hayden, on behalf of Nexus Gas Transmission, LLC, and/or the other defendants, would be contacting them.

(15) Thereafter, plaintiffs continued to feel vibration in their home. This included, but was not necessarily limited to, vibration on the windows and floor. Plaintiffs believe that for a short period the defendants stopped drilling, resuming it a few days later.

(16) Near the end of April, Clay Hayden and Chris Simmons came to plaintiffs' residence where leaks, which had not existed before, were pointed out. There was a leak and crack in the garage ceiling. Damage also occurred with respect to decorative stones outside above the garage door.

(17) Into May and June, the leaks continued and intensified.

(18) Ripples in coffee and other liquids from the drilling/blasting vibration(s) were observed. Plaintiffs would feel the vibrations while sitting in the furniture in their home.

(19) As a direct and proximate result of the actions of these defendants in the construction of the natural gas pipeline adjacent to and/or in the vicinity of plaintiffs' real property, which included drilling (horizontal directional drilling) and/or blasting plaintiffs residence was exposed to vibrations and concussions which damaged plaintiffs' residence. This damage included, but is not necessarily limited to, cracks in the drywall/structure, water leaks, patio stones moved and made uneven, cracks in the patio stone retaining wall, shifting of the concrete slabs next to the barn door at the base of the shop area, and a gas leak in the meter riser which had to be repaired and replaced. The water leaks included, but were/are not limited to,

water on the carpet from a leak in the ceiling in the living room, above the/an outside hallway door, guest bedroom, landing closet, kitchen, and garage ceiling.

(20) Plaintiffs state that most of the damages described herein have not been remedied/repared, despite requests for Nexus and any other responsible party to do so.

(21) Plaintiffs further state that they have lost the use and/or enjoyment of their long-time residence, which continues into the present, and which plaintiffs believe will continue indefinitely into the future until such time as the damage caused by these defendants is remedied/repared.

(22) The damage described herein was directly and proximately caused by the construction activities of these defendants in building their natural gas pipeline in Erie County, Ohio on property adjacent to plaintiffs which caused vibration and concussion which was transmitted to plaintiffs' real property.

COUNT ONE
Strict Liability As To All Defendants

(23) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(24) The means which these defendants employed in the construction of the Nexus Gas Transmission pipeline in Erie County, Ohio, which included blasting and/or boring, by its very nature, injured and destroyed the neighboring property of plaintiffs, irrespective of the care used by the defendants in the handling of these destructive agencies, which directly and proximately caused the vibrations and concussions which damaged plaintiffs' property and resulted in the loss of use and/or enjoyment of their residence.

(25) Defendants are absolutely liable, as a matter of Ohio law, for the damages sustained by plaintiffs resulting from vibrations and concussions from the construction of the Nexus Gas Transmission pipeline in Erie County, Ohio as described herein.

(26) As a direct and proximate result of the vibrations and concussions from the construction of the Nexus Gas Transmission pipeline by these defendants, the cost of repair for the damages proximately caused are approximately Three Hundred Thousand Dollars (\$300,000). The cost of replacement of plaintiffs' residence would exceed Eight Hundred Fifty Thousand Dollars (\$850,000). The value of plaintiffs' residence has been substantially diminished as a result of the damage caused plaintiffs' residence from vibrations and concussions during the construction of the Nexus Gas Transmission pipeline by these defendants.

(27) In addition, plaintiffs have suffered loss of use and/or enjoyment of their residence directly and proximately resulting from the construction of the pipeline in Erie County, Ohio previously described herein.

WHEREFORE, plaintiffs pray for judgment against these defendants in a sum in excess of Twenty-Five Thousand Dollars (\$25,000), plus the costs of this action, reasonable attorneys fees and litigation expenses, pre-judgment and post-judgment interest, and such further relief as the Court finds plaintiffs to be entitled either in law or in equity.

COUNT TWO

Private Absolute Nuisance – Alternate Basis For Strict Liability As To All Defendants

(28) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(29) In the alternative, absolute nuisance serves as a basis for strict liability as to all defendants. Defendants, on premises which they controlled, conducted abnormally, inherently dangerous and/or ultrahazardous activities in the construction of the Nexus Gas Transmission pipeline in Erie County, Ohio, which included blasting and/or boring.

(30) Defendants, by carrying on abnormally, inherently dangerous and/or ultrahazardous activities, are subject to strict liability for the harm and damages sustained by plaintiffs resulting from that activity, irrespective of whether defendants exercised the utmost care to prevent the harm sustained by plaintiffs.

(31) Defendants' conduct in the construction of the Nexus Gas Transmission pipeline involved an unreasonable potential for the performance of acts which caused annoyance, discomfort, or injury to plaintiffs and/or damages to the land which they owned.

(32) As a direct and proximate cause of the abnormally, inherently dangerous and/or ultrahazardous activities engaged in by defendants in the construction of the pipeline which is the subject of this litigation, plaintiffs suffered the damages previously described.

(33) Defendants acted intentionally in the creation of vibrations and concussions which damaged plaintiffs' property and the loss of the enjoyment of their property as a result of engaging in the conduct which produced the vibrations and concussions, knowing that it would and was, in fact, causing damage to plaintiffs' residence. Defendants and/or their agents inspected plaintiffs' residence and had actual knowledge of the damage caused by these defendants' wrongful conduct.

(34) These defendants' conduct was not only intentional, but was also unreasonable, as the gravity of the potential harm suffered by plaintiffs outweighed the utility of the defendants' conduct.

WHEREFORE, plaintiffs pray for judgment against these defendants in a sum in excess of Twenty-Five Thousand Dollars (\$25,000), plus the costs of this action, reasonable attorneys fees and litigation expenses, pre-judgment and post-judgment interest, and such further relief as the Court finds plaintiffs to be entitled either in law or in equity.

COUNT THREE

Trespass – Alternate Basis For Strict Liability As To All Defendants

(35) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(36) In the alternative, as another basis for strict liability as to all defendants, defendants trespassed on plaintiffs' premises, the real property located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio, Auditor Parcel #: 50-00330.000, by the creation of the vibrations and concussions previously described herein.

(37) At all relevant times herein, plaintiffs were in possession of, and had the right to possession of the premises located at 10510 Mudbrook Road, Huron, Ohio 44839; Erie County, Ohio, Auditor Parcel #: 50-00330.000, and that the defendants entered upon plaintiffs' land/premises without plaintiffs' permission. At all relevant times herein, plaintiffs had record title to, and/or were entitled to possession of the premises.

(38) As a direct and proximate result of the trespass upon plaintiffs' premises by defendants, plaintiffs sustained the actual damages previously described herein.

WHEREFORE, plaintiffs pray for judgment against these defendants in a sum in excess of Twenty-Five Thousand Dollars (\$25,000), plus the costs of this action, reasonable attorneys fees and litigation expenses, pre-judgment and post-judgment interest, and such further relief as the Court finds plaintiffs to be entitled either in law or in equity.

COUNT FOUR
Punitive Damages

(39) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(40) Plaintiffs should be awarded punitive damages against these defendants as punishment and to discourage others from committing similar wrongful acts.

(41) Defendants' actions demonstrated actual malice and/or they knowingly authorized, participated in, and ratified the actions or omissions of their agent(s) or servant(s) conduct that demonstrated actual malice.

(42) Defendants' actions and wrongful conduct demonstrated actual malice by exhibiting a conscious disregard for the rights and safety of plaintiffs and their property that had a great probability of causing substantial, major, or significant harm.

(43) Defendants' wrongful conduct, which consisted of defendants knowingly and intentionally creating vibrations and concussions in the construction of the pipeline which defendants knew would damage and was damaging plaintiffs' real property, and would also result in loss of use and/or enjoyment of said property, entitles plaintiffs to punitive damages.

(44) Defendants' wrongful conduct proximately caused the damages previously described in this Complaint.

WHEREFORE, plaintiffs request, in addition to compensatory damages, punitive or exemplary damages in such sum as the trier of fact finds plaintiffs to be entitled, plus reasonable attorneys fees, litigation expenses, pre- as well as post-judgment interest, and such further relief as this Court finds plaintiffs to be entitled either in law or in equity.

COUNT FIVE

In The Alternative, Negligence Liability As To Defendants

(45) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(46) Alternatively, and only in the event plaintiffs are not entitled to recover from defendants under a theory of strict liability, plaintiffs allege that the defendants are legally liable to plaintiffs for their negligent conduct in the construction of the Nexus Gas Transmission pipeline which fell below the standard of care creating vibrations and concussions which damaged plaintiffs' property, and results in liability for such negligent conduct.

(47) Defendants' negligent conduct directly and proximately caused plaintiffs' injuries and damages previously described in this Complaint.

WHEREFORE, plaintiffs pray for judgment against these defendants in a sum in excess of Twenty-Five Thousand Dollars (\$25,000), plus the costs of this action, reasonable attorneys fees and litigation expenses, pre-judgment and post-judgment interest, and such further relief as the Court finds plaintiffs to be entitled either in law or in equity.

COUNT SIX

**Vicarious Liability As To Defendants Nexus Gas Transmission, LLC,
DTE Energy Company, Enbridge, Inc., and/or John Doe I, John Doe II,
John Doe III, John Doe IV**

(48) Plaintiffs reiterate all well pled material allegations set forth above and reallege and incorporate them as if fully rewritten herein.

(49) Defendants, DTE Energy Company and Enbridge, Inc., are vicariously liable for the acts of Nexus Gas Transmission, LLC and its employees and agents for the damages Nexus Gas Transmission, LLC and its employees and agents caused plaintiffs as previously described in this Complaint, as the two (2) equal partners of Nexus Gas Transmission, LLC..

(50) Nexus Gas Transmission, LLC is vicariously liable for the acts of its agents including, but not limited to, Dykon Blasting Corp., and/or John Does I through IV.

WHEREFORE, plaintiffs request judgment against DTE Energy Company and Enbridge, Inc. for the damages caused plaintiffs by Nexus Gas Transmission, LLC and its employees and agents. Plaintiffs also request judgment against DTE Energy Company, Enbridge, Inc., and Nexus Gas Transmission, LLC for the damages sustained by plaintiffs as a result of Dykon Blasting Corp.'s conduct in building the Nexus Gas Transmission pipeline, which included blasting and/or boring in Erie County, Ohio as well as the conduct of John Doe I, John Doe II, John Doe III, and John Doe IV.

Respectfully submitted,

/s/ James L. Murray

James L. Murray (0068471)

jlm@murrayandmurray.com

Direct dial: (419) 624-3129

William H. Bartle (0008795)

whb@murrayandmurray.com

Direct dial: (419) 624-3012

MURRAY & MURRAY CO., L.P.A.

111 East Shoreline Drive

Sandusky, Ohio 44870

Facsimile: (419) 624-0707

Attorneys for Plaintiffs

CERTIFIED MAIL



Trk #: 92148901940383000010075042

Mail Stop: 9C-59

Department: General Counsel

Full Name: Berry, Carolyn

Floor: 9

Notes:

Date Rec'd: 4/6/2020 10:38:26 AM

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL



9214 8901 9403 8300 0010 0750 42

2020 CV 0150 /Z 000 082 247
Enbridge, Inc.
5400 Westheimer Court
Houston, TX 77056

111 E. Shoreline Drive
Sandusky OH 44870-2517

If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

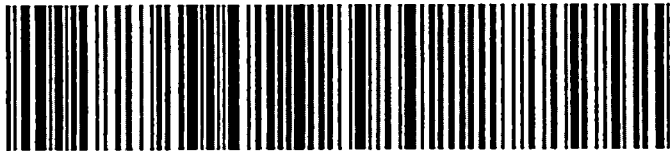
March 27, 2020
Z000082247

LUVADA S. WILSON, Clerk


By Mary Caffey, Deputy

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL



9214 8901 9403 8300 0010 0750 11

2020 CV 0150 /Z 000 082 244
Nexus Gas Transmission, LLC
6050 Oaktree Blvd., Suite 200
Cleveland, OH 44131

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL

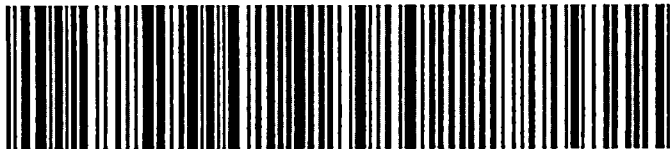


9214 8901 9403 8300 0010 0750 28

2020 CV 0150 /Z 000 082 245
Nexus Gas Transmission, LLC
P.O. Box 490
Sharon Center, OH 44274

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL

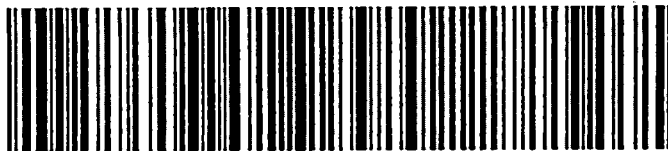


9214 8901 9403 8300 0010 0750 35

2020 CV 0150 /Z 000 082 246
DTE Energy Company
One Energy Plaza
Detroit, MI 48226

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL

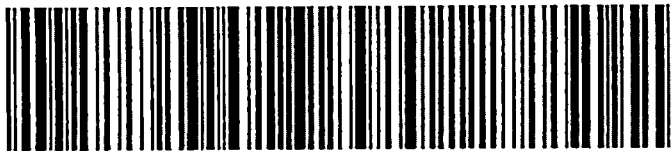


9214 8901 9403 8300 0010 0750 42

2020 CV 0150 /Z 000 082 247
Enbridge, Inc.
5400 Westheimer Court
Houston, TX 77056

If Undeliverable, Return To
LUVADA WILSON
ERIE COUNTY
CLERK OF COURTS
323 COLUMBUS AVE
SANDUSKY, OHIO 44870

USPS CERTIFIED MAIL



9214 8901 9403 8300 0010 0750 59

2020 CV 0150 /Z 000 082 248
Dykon Blasting Corp.
8120 West 81st Street
Tulsa, OK 74131

COURT OF COMMON PLEAS, ERIE COUNTY

323 Columbus Avenue, Sandusky, Ohio 44870

SUMMONS

Rule 4 1970 Ohio Rules of Civil Procedure

Case No. 2020 CV 0150

Plaintiff(s):

Ronald Johnson / Individually and as Trustee
10510 Mudbrook Road
HURON OH 44839

SUMMONS ON COMPLAINT

vs.

Defendant(s):

Nexus Gas Transmission, LLC
6050 Oaktree Blvd., Suite 200
Cleveland OH 44131

Nexus Gas Transmission, LLC
P.O. Box 490
Sharon Center OH 44274

DTE Energy Company
One Energy Plaza
Detroit MI 48226

Enbridge, Inc.
5400 Westheimer Court
Houston TX 77056

Dýkon Blasting Corp.
8120 West 81st Street
Tulsa OK 74131

To the above named defendant(s):

You are hereby summoned that a complaint (a copy of which is hereto attached and made a part hereof) has been filed against you in this court by the plaintiff(s) named herein.

You are required to serve upon the plaintiff's attorney or upon the plaintiff's if he/she has no attorney of record, a copy of your answer to the complaint within **28 days** after service of this summons upon you, exclusive of the day of service. Said answer must be filed with this court within three days after service on Plaintiff's Attorney.

The name and address of the plaintiff's attorney is as follows:

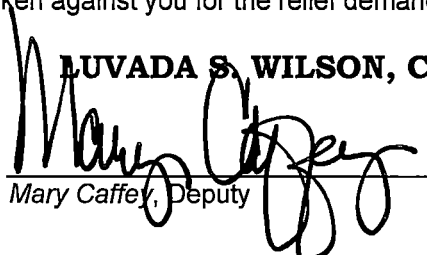
James L Murray Esq
Murray & Murray Co., LPA

111 E. Shoreline Drive
Sandusky OH 44870-2517

If you fail to appear and defend, judgment by default will be taken against you for the relief demanded in the complaint.

March 27, 2020
Z000082248

LUVADA S. WILSON, Clerk


By *Mary Caffey*, Deputy



FILED
COMMON PLEAS COURT
ERIE COUNTY, OHIO

2020 APR -7 AM 8:13

LUVADA S. WILSON
CLERK OF COURTS

Date Produced: 04/06/2020

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0010 0750 28. Our records indicate that this item was delivered on 04/02/2020 at 08:27 a.m. in SHARON CENTER, OH 44274. The scanned image of the recipient information is provided below.

Signature of Recipient :

Lori Brees
Lori Brees

Address of Recipient :

PO Box 490

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C2004332.11421039

USPS MAIL PIECE TRACKING NUMBER: 42044274921489019403830000010075028

MAILING DATE: 03/27/2020

DELIVERED DATE: 04/02/2020

Custom 1: 2020 CV 0150

Custom 2: /Z 000 082 245

MAIL PIECE DELIVERY INFORMATION:

Nexus Gas Transmission, LLC
P.O. Box 490
Sharon Center, OH 44274

MAIL PIECE TRACKING EVENTS:

03/27/2020 13:36	PRE-SHIPMENT INFO SENT USPS AWAITS ITEM	SANDUSKY,OH 44870
03/31/2020 07:51	ARRIVAL AT UNIT	SANDUSKY,OH 44870
03/31/2020 20:21	ORIGIN ACCEPTANCE	SANDUSKY,OH 44870
03/31/2020 21:36	PROCESSED THROUGH USPS FACILITY	CLEVELAND,OH 44101
04/01/2020 12:50	PROCESSED THROUGH USPS FACILITY	AKRON,OH 44309
04/02/2020 07:40	ARRIVAL AT UNIT	SHARON CENTER,OH 44274
04/02/2020 08:27	DELIVERED	SHARON CENTER,OH 44274



**UNITED STATES
POSTAL SERVICE**

FILED
COMMON PLEAS COURT
ERIE COUNTY, OHIO

2020 APR -7 AM 8:13

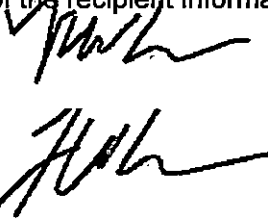
LUVADA S. WILSON
CLERK OF COURTS

Date Produced: 04/06/2020

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0010 0750 42. Our records indicate that this item was delivered on 04/03/2020 at 11:58 a.m. in HOUSTON, TX 77056. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient :



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C2004332.11421041

USPS MAIL PIECE TRACKING NUMBER: 4207705692148901940383000010075042

MAILING DATE: 03/27/2020

DELIVERED DATE: 04/03/2020

Custom 1: 2020 CV 0150

Custom 2: /Z 000 082 247

MAIL PIECE DELIVERY INFORMATION:

Enbridge, Inc.
5400 Westheimer Court
Houston, TX 77056

MAIL PIECE TRACKING EVENTS:

03/27/2020 13:36	PRE-SHIPMENT INFO SENT USPS AWAITS ITEM	SANDUSKY,OH 44870
03/31/2020 07:51	ARRIVAL AT UNIT	SANDUSKY,OH 44870
03/31/2020 20:21	ORIGIN ACCEPTANCE	SANDUSKY,OH 44870
03/31/2020 21:36	PROCESSED THROUGH USPS FACILITY	CLEVELAND,OH 44101
04/02/2020 10:29	PROCESSED THROUGH USPS FACILITY	NORTH HOUSTON,TX 77315
04/03/2020 11:58	DELIVERED LEFT WITH INDIVIDUAL	HOUSTON,TX 77056



**UNITED STATES
POSTAL SERVICE**

FILED
COMMON PLEAS COURT
ERIE COUNTY, OHIO

2020 APR -7 AM 8:13

LUVADA S. WILSON
CLERK OF COURTS

Date Produced: 04/06/2020

ConnectSuite Inc.:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0010 0750 59. Our records indicate that this item was delivered on 04/03/2020 at 10:20 a.m. in TULSA, OK 74131. The scanned image of the recipient information is provided below.

Signature of Recipient :

IT Jackson

IT Jackson

Address of Recipient :

EG01 9W 81-A
T 10 74131

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C2004332.11421042

USPS MAIL PIECE TRACKING NUMBER: 4207413192148901940383000010075059

MAILING DATE: 03/27/2020

DELIVERED DATE: 04/03/2020

Custom 1: 2020 CV 0150

Custom 2: /Z 000 082 248

MAIL PIECE DELIVERY INFORMATION:

Dykon Blasting Corp.
8120 West 81st Street
Tulsa, OK 74131

MAIL PIECE TRACKING EVENTS:

03/27/2020 13:36	PRE-SHIPMENT INFO SENT USPS AWAITS ITEM
04/03/2020 10:20	DELIVERED FRONT DESK/RECEPTION/MAIL ROOM

SANDUSKY, OH 44870
TULSA, OK 74131



**UNITED STATES
POSTAL SERVICE**

FILED
COMMON PLEAS COURT
ERIE COUNTY, OHIO

2020 APR 14 AM 8:25

Date Produced: 04/13/2020

ConnectSuite Inc.:

LUVADA S. WILSON
CLERK OF COURTS

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 9403 8300 0010 0750 35. Our records indicate that this item was delivered on 04/07/2020 at 12:04 p.m. in DETROIT, MI 48226. The scanned image of the recipient information is provided below.

Signature of Recipient :

[Handwritten Signature]
FIRG-Y Mail

Address of Recipient :

ONE
P. 1100 277
A-21

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: C2004332.11421040

USPS MAIL PIECE TRACKING NUMBER: 4204822692148901940383000010075035

MAILING DATE: 03/27/2020

DELIVERED DATE: 04/07/2020

Custom 1: 2020 CV 0150

Custom 2: /Z 000 082 246

MAIL PIECE DELIVERY INFORMATION:

DTE Energy Company
One Energy Plaza
Detroit, MI 48226

MAIL PIECE TRACKING EVENTS:

03/27/2020 13:36	PRE-SHIPMENT INFO SENT USPS AWAITS ITEM	SANDUSKY,OH 44870
03/31/2020 07:51	ARRIVAL AT UNIT	SANDUSKY,OH 44870
03/31/2020 20:21	ORIGIN ACCEPTANCE	SANDUSKY,OH 44870
03/31/2020 21:36	PROCESSED THROUGH USPS FACILITY	CLEVELAND,OH 44101
04/03/2020 09:31	OUT FOR DELIVERY	DETROIT,MI 48226
04/03/2020 12:08	NO ACCESS	DETROIT,MI 48226
04/04/2020 10:05	NO ACCESS	DETROIT,MI 48226
04/07/2020 10:24	ON ROUTE	DETROIT,MI 48226
04/07/2020 12:04	DELIVERED FRONT DESK/RECEPTION/MAIL ROOM	DETROIT,MI 48226